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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LEZLIE J. GUNN, an individual,

Plaintiff,

vs.

CHRISTINE E. DRAGE, an individual,

Defendant.

) Case No: 2:19-cv-02102-JCM-EJY

) Assigned for all purposes to  
) Hon. James C. Mahan

) **STIPULATION FOR STAY OF  
) ENFORCEMENT OF JUDGMENT  
) UPON POSTING OF APPELLATE  
) BOND**

) Action Filed: September 6, 2019  
) Judgment Entered: May 1, 2020

**STIPULATION**

Plaintiff Lezlie J. Gunn and defendant Christine E. Drage, by and through their undersigned counsel, enter into the following stipulation with reference to the following:

**WHEREAS**, judgement was entered in this action in favor of defendant Drage and against plaintiff Gunn on May 1, 2020;

**WHEREAS**, an amended judgment was entered on March 17, 2021, awarding defendant Drage attorney's fees and costs against plaintiff Gunn;

**WHEREAS**, the Parties have engaged in discussions regarding plaintiff Gunn's posting a bond to secure the award in the March 17, 2021 amended judgment;

**WHEREAS**, plaintiff Gunn is making arrangements to post the bond by February 4, 2023;

1           **WHEREAS**, the Parties agree that upon posting of the bond in the amount of  
2     \$401,949.15, proceedings to enforce the judgment will not be necessary pending plaintiff  
3     Gunn's appeal to Ninth Circuit Court of Appeals;

4           **WHEREFORE, IT IS HEREBY STIPULATED** by and between the Parties,  
5     through their respective attorneys of record, that there will be a stay of execution on  
6     defendant Drage's judgment against plaintiff Gunn immediately upon the posting of the  
7     bond contemplated above, and that the stay will extend until 30-days after the Ninth  
8     Circuit Court of Appeals issues its final decision concerning the March 17, 2021 amended  
9     judgment.

10  
11  
12     DATED: January 27, 2023

THOMAS VOGELE & ASSOCIATES, APC

13  
14           By: /s/ Timothy Kowal

15           Thomas A. Vogeles

16           Timothy M. Kowal

17           Teddy T. Davis

18           Attorneys for plaintiff Lezlie J. Gunn

19     DATED: January 27, 2023

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

20  
21  
22           By: 

23           Mitchell J. Langberg

24           Attorneys for defendant Christine E. Drage

25     **DATED: February 1, 2023**

26             
27           UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

I, declare that I am over the age of 18 years, employed in the County of Orange, and not a party to the within action; my address is 129 W. Wilson St., Suite 200, Costa Mesa, CA 92627. On January 27, 2023 I served the foregoing:

**STIPULATION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT UPON POSTING OF SURETY**

on the interested parties in this action via email to the persons hereinafter listed:

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Attorneys for defendant Christine E. Drage

Attorneys for defendant Christine E. Drage

☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 27, 2023, in Costa Mesa, California.

/s/ Lynne Marino

Lynne Marino